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Court S. Rich AZ Bar No. 021290
Rose Law Group pc
6613 N. Scottsdale Road, Suite 200
Scottsdale, Arizona 85250
Direct: (480) 505-3937
Fax: (480) 505-3925
Attorney for SolarCity Corporation

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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

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CHAIRMAN

SANDRA D. KENNEDY
COMMISSIONER

PAUL NEWMAN
COMMISSIONER

BRENDA BURNS
COMMISSIONER

BOB STUMP
COMMISSIONER

IN THE MATTER OF THE)
APPLICATION OF TUCSON) DOCKET NO. E-01933A-11-0269
ELECTRIC POWER COMPANY)
FOR APPROVAL OF ITS 2012)
RENEWABLE ENERGY STANDARD)
IMPLEMENTATION PLAN AND) SOLARCITY'S PROPOSED
DISTRIBUTED ENERGY) AMENDMENTS TO STAFF'S
ADMINISTRATIVE PLAN AND) RECOMMENDED ORDER
REQUEST FOR RESET OF)
RENEWABLE ENERGY ADJUSTOR)

SolarCity Corporation ("SolarCity"), by and through its undersigned counsel, hereby files
its Proposed Amendments to Staff's Recommended Order issued in the above referenced matter.

RESPECTFULLY SUBMITTED this 30th day of November, 2011.


Court S. Rich

Rose Law Group pc
6613 N. Scottsdale Road, Suite 200
Scottsdale, Arizona 85250
Attorney for SolarCity Corporation

Arizona Corporation Commission
DOCKETED

NOV 30 2011

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1
2 **Original plus 13 copies of the foregoing**
3 **filed this 5th day of November 2011:**

4 Docket Control
5 Arizona Corporation Commission
6 1200 W. Washington Street
7 Phoenix, Arizona 85007

8 *I hereby certify that I have this day served the foregoing documents on all parties of record in
9 this proceeding by sending a copy via electronic mail to:*

10 Lyn Farmer
11 Chief Administrative Law Judge
12 Arizona Corporation Commission
13 1200 W. Washington Street
14 Phoenix, Arizona 85007
15 *lfarmer@azcc.gov*

Phillip Dion
Tucson Electric Power Company
One S. Church Avenue, Suite 200
Tucson, Arizona 85701
pdion@tep.com

Michael Patten
Roshka DeWulf
& Patten, PLC
400 E. Van Buren, Suite 800
Phoenix, Arizona 85004
mpatten@rdp-law.com

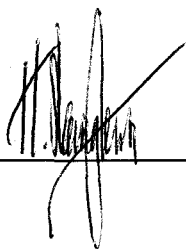
16 Janice Alward, Esq.
17 Chief Counsel, Legal Division
18 Arizona Corporation Commission
19 1200 W. Washington Street
20 Phoenix, Arizona 85007
21 *jalward@azcc.gov*

Scott Wakefield
Ridenour Hienton & Lewis PLLC
201 N. Central Avenue, Suite 3300
Phoenix, Arizona 85004
sswakefield@rhkl-law.com

Bradley S. Carroll, Esq.
Tucson Electric Power
Company
P.O. Box 711, MS UE201
Tucson, Arizona 85702
bcarroll@tep.com

22 Steve Olea
23 Director, Utilities Division
24 Arizona Corporation Commission
25 1200 W. Washington Street
26 Phoenix, Arizona 85007
27 *solea@azcc.gov*

C. Webb Crockett
Patrick J. Black
Fennemore Craig, P.C.
3003 N. Central Avenue, Suite 2600
Phoenix, Arizona 85012-2913
wcrockett@fclaw.com
pblack@fclaw.com

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Introduction

This filing is a supplement to SolarCity's Comments and Exceptions in Response to Staff's Recommended Order (the "Exceptions") docketed in this matter on November 4, 2011. After further analysis of the Staff's Recommended Order (the "RO"), discussions with stakeholders, and additional review, SolarCity has made some modifications to the Amendments it seeks to the RO. The attached proposed Amendments to the RO are intended to supersede and clarify SolarCity's previously filed Exceptions.

I. The Amendments

SolarCity proposes two Amendments to the RO. Each of these Amendments and the reasons why they are needed was described in more detail in the Exceptions. The Amendments are each attached as Exhibits hereto and are titled as follows:

Exhibit A: "Amendment to standardize timing of system owner reporting for residential systems."

Exhibit B: "Amendment to retain 50% cap on incentive payments for residential DG systems."

EXHIBIT A

Amendment to standardize timing of system owner reporting for residential systems

We find TEP's current process of requiring the identification of the owner of a residential solar system at the time of the application for the rebate reservation to be out of line with more efficient processes currently in place in Arizona Public Service's territory. Instead, the final system owner should be identified once the completion certificate is submitted to the utility. Requiring the system owner to be identified at the time of application causes inefficiencies and complications for the very popular residential leasing model and we seek to remove these inefficiencies. We believe that TEP should not require the identification of the final system owner until a completion certificate is submitted. Until that time, the application will be in the name of the homeowner.

AMENDMENT

Page 37, Line 28;

INSERT new Ordering Paragraph following the final Ordering Paragraph on the page as follows:

“IT IS FURTHER ORDERED that Tucson Electric Power shall not require that a final owner be identified for a system until such time as a completion certificate is submitted.”

EXHIBIT B

Amendment to retain 50% cap on incentive payments for residential DG systems

The downward trend in residential upfront incentives since the program's inception has been significant. Incentives are now 75% lower than they were when the program opened in 2009. As a result of the already reduced incentives, we believe that the current 50% cap on incentives is sufficient to protect ratepayers.

AMENDMENT

Page 32, Line 28;

DELETE the number "40" and INSERT the number "50"